

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	
	:	
TODD NEWMAN, and	:	No. 12-CR-00121 (RJS)
ANTHONY CHIASSON,	:	
	:	
	:	
Defendants.	:	
	:	
-----	X	

DECLARATION OF STEPHEN FISHBEIN
IN SUPPORT OF RENEWED MOTION FOR SEVERANCE

Stephen Fishbein, an attorney duly admitted to practice before the courts of the State of New York and the United States District Court for the Southern District of New York, declares, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am a partner at Shearman & Sterling LLP, counsel to Defendant Todd Newman in the above-captioned action. I submit this declaration in support of Mr. Newman's Renewed Motion for Severance.
2. Attached hereto as Exhibit A is a representative sample, by defense exhibit number, of emails that counsel has identified as being among the exhibits we understand that Mr. Chiasson will use at the trial.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
October 19, 2012

/s/ Stephen Fishbein
Stephen Fishbein